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**Attorney for Defendant Earl D. Fisher**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION**

**UNITED STATES OF AMERICA,**

**CASE NO. 3:18-CR-00319-JO-2**

**Plaintiff,**

**DEFENDANT EARL D. FISHER  
MOTION TO PRODUCE ALL  
CONFIDENTIAL  
INFORMANTS, BENEFITS, AND  
DEFENSE ATTORNEY  
INTERVIEW**

**v.**

**EARL D. FISHER,**

**Defendant,**

COMES NOW the defendant, Earl D. Fisher, by and through his attorney, Ernest Warren, Jr., and moves the court for an order compelling the government to produce all confidential informants and/or cooperating witnesses as follows:

- A. Identities and contact information;
- B. Disclosure of all benefits made or offered to informants or witnesses as inducement for information, including but not limited to money, leniency, and/or immunity;

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- C. The names of all agents and their state, local or federal agencies who have received any information from the informants or witnesses in this case or any other cases, or who have conferred benefits to the informant or witness or an associate of the informants or witnesses;
- D. Production and disclosure of any informant or witness files in the custody of the DEA or any other state, local or federal law enforcement agencies;
- E. All information regarding the informants or witnesses prior testimony in this or any other proceeding; and
- F. All records or evidence regarding informants and witnesses drug and alcohol habits; and
- G. All records or evidence regarding informants and witnesses psychiatric treatment, and/or drug or alcohol treatment.

POINTS AND AUTHORITIES

*Roviaro v. U.S.*, 353 U.S. 53 (1957)

*Brady v. Maryland*, 373 U.S. 83 (1963)

DATED this 21 day of August, 2018

RESPECTFULLY SUBMITTED,  
**WARREN & SUGARMAN**

/s/ Ernest Warren, Jr.

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**Ernest Warren, OSB No. #891384**  
Attorney for defendant

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**CERTIFICATE OF SERVICE**

I hereby certify that I have served a certified true copy of **Defendant Earl D. Fisher Motion to Produce All Confidential Informants, Benefits, & Defense Attorney Interview** in the attached matter upon the parties listed below on by notice of electronic filing using the CM/ECF System:

**AUSA Leah Bolstad**  
United States Attorney's Office  
1000 S.W. Third Avenue  
Suite 600  
Portland, OR 97204

and filed the original with the Court on the date listed below.

DATED this 21 of August, 2018.

**WARREN & SUGARMAN**

/s/ Ernest Warren, Jr.  
**Ernest Warren, Jr. OSB No. 891384**  
Attorney for defendant